

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Patricia Mae Kerr Karasov,

Civil File No. 14-cv-1503 (SRN/BRT)

Plaintiff,

v.

**STIPULATION FOR DISMISSAL
AND ENTRY OF FINAL JUDGMENT
REGARDING PLAINTIFF'S CLAIMS
AGAINST RAMSEY COUNTY**

Caplan Law Firm P.A., *et al.*

Defendants.

Plaintiff Patricia Mae Kerr Karasov ("Plaintiff") and Defendant Ramsey County, by and through their respective counsel, submit this Stipulation as follows:

WHEREFORE, Defendant Ramsey County served a Rule 68 Offer of Judgment on Plaintiff in the captioned matter; and

WHEREFORE, Plaintiff accepted said Rule 68 Offer of Judgment; and

WHEREFORE, Ramsey County's Rule 68 Offer of Judgment expressly excluded claims for attorneys' fees and costs to allow Plaintiff to petition the Court for such fees and costs; and

WHEREFORE, in lieu of submitting a petition for fees and proceeding with additional motion practice related to a petition for fees and costs, the parties reached agreement on the amount of attorneys' fees and costs to be paid to Plaintiff and such issue no longer requires action from the Court; and

WHEREFORE, Ramsey County has paid in full both the amount referenced in the Rule 68 Offer of Judgment and the amount the parties agreed upon for Plaintiff's attorneys' fees and costs;

NOW THEREFORE, the parties, through their respective counsel, submit this

Stipulation and request that:

- (1) The Court enter judgment as set forth in the Rule 68 Offer of Judgment; and,
- (2) The Court dismiss with prejudice all of Plaintiff's claims against Ramsey County and the John and Jane Doe Defendants allegedly associated with Ramsey County.

Dated: May 7, 2015

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Ramsey County Attorney

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***ATTORNEYS FOR DEFENDANT
RAMSEY COUNTY***

Dated: May 7, 2015

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